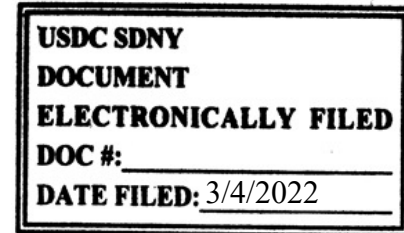


JOHN H. SNYDER | 555 FIFTH AVENUE, SUITE 1700
NEW YORK, NY 10017



March 1, 2022

By ECF

Hon. Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: City of Almaty, Kazakhstan et al v. Sater et al., 19-cv-02645-AJN-KHP

Dear Judge Parker:

We represent the Defendants in the above-referenced action. We write to request a 30-day extension of the discovery cutoff date, which is currently March 2, 2022.¹

As the Court is aware, the parties have actively engaged in fact discovery, however, they respectfully submit that good cause exists to extend the discovery deadlines for a variety of reasons, including the volume and complexity of discovery, the need to resolve ongoing and potential discovery motion practice, the recent appearance of defendant MeM Energy Partners LLC, and the parties' efforts to mediate this dispute as well as the somewhat-related arbitration involving Litco LLC.

Plaintiffs City of Almaty and BTA Bank JSC consent to this adjournment with the understanding that Defendants agree not to use the discovery extension to argue that Defendants' proposed amended answer and counterclaims are timely and/or do not prejudice Plaintiffs. *See* Docket No. 361. Defendant MeM Energy Partners LLC likewise consents.

The parties are of course available to answer any questions that the Court may have. Thank you for your consideration of this request

Very truly yours,

John H. Snyder

cc: Counsel of Record

Fact discovery is hereby extended to March 24, 2022. The parties' shall be prepared to discuss the progress of discovery at the conference.

SO ORDERED:

HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

3/4/2022

¹ Defendants also have a pending motion to extend the discovery period by 120 days (Docket No. 361).